1	JOSEPH H. HUNT		
2	Assistant Attorney General		
3	DAVID L. ANDERSON United States Attorney		
	JOHN R. TYLER		
4	Assistant Director DANIEL D. MAULER (Va. Bar #73190)		
5	Trial Attorney Department of Justice, Civil Division		
6	P.O. Box 883		
7	Washington, DC 20044 Telephone: (202) 616-0773		
8	Facsimile: (202) 616-8470		
9	E-mail: dan.mauler@usdoj.gov COUNSEL FOR DEFENDANTS		
10	(See signature page for parties represented.)		
11	IN THE UNITED STATES DISTRICT COURT		
12	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
13	SAN FRANCISCO DIVISION		
14	CITY AND COUNTY OF SAN	STIPULATION AND [PROPOSED]	
15	FRANCISCO,	ORDER REGARDING SCHEDULING OF	
16	Plaintiff, v.	CASE MANAGEMENT CONFERENCE	
17	DONALD J. TRUMP, et al.,	No. 3:17-cv-00485-WHO	
18	Defendants.	110. 3.17-CV-00 1 03-W110	
	COLINTY OF CANTA CLADA		
19	COUNTY OF SANTA CLARA, Plaintiff,		
20	v.		
21	DONALD J. TRUMP, et al.,	No. 3:17-cv-00574-WHO	
22	Defendants.		
23	WHEREAS, per order of this Court, a Case Management Conference is currently		
24	scheduled to be held in the above-captioned cases on August 6, 2019, at 2:00 p.m., to consider		
25	how to proceed with the issue that has been remanded by the Ninth Circuit, namely, whether a		
26	nationwide injunction is appropriate in these cases; and		
27	WHEREAS, the parties in these cases have been engaged in negotiating a settlement to		
28	resolve this matter without the need for further court intervention;		
	Stipulation and [Proposed] Order No. 3:17-cv-00485/00574-WHO		

1	WHEREAS, the parties believe they have reached an agreement in principle to resolve		
2	these cases without further court intervention;		
3	WHEREAS, undersigned counsel seek additional time to have their respective		
4	governmental clients review and formally approve this agreement;		
5	WHEREAS, the parties believe that such review and approval will require no more than		
6	fourteen (14) days;		
7	WHEREAS, once that formal review and approval occurs, the parties anticipate filing a		
8	joint Stipulation and Final Judgment with a proposed order, and that, assuming approval by the		
9	Court, the pending Case Management Conference may be cancelled as moot.		
10	NOW THEREFORE, the parties hereby jointly stipulate that the Case Management		
11	Conference currently scheduled for August 6, 2019, be rescheduled for August 20, 2019, at 2:00		
12	p.m., subject to the Court's availability.		
13	Respectfully submitted,		
14	DENNIS J. HERRERA (CA Bar #139669)	JOSEPH H. HUNT	
15	City Attorney	Assistant Attorney General	
16	JESSE C. SMITH (CA Bar #122517) Chief Assistant City Attorney	DAVID L. ANDERSON	
17	RONALD P. FLYNN (CA Bar #184186)	United States Attorney	
18	Chief Deputy City Attorney	JOHN R. TYLER Assistant Director	
19	YVONNE R. MERÉ (CA Bar #173594) Chief of Complex and Affirmative Litigation		
20	Cinei of Complex and Arminative Engation	/s/ Daniel D. Mauler	
21	/s/ Sara J. Eisenberg SARA J. EISENBERG (CA Bar #269303)	DANIEL D. MAULER (Va. Bar #73190)	
22	TARA M. STEELEY (CA Bar #231775)	Trial Attorney	
23	AILEEN M. McGRATH, (CA Bar #280846) Deputy City Attorneys	Department of Justice, Civil Division P.O. Box 883	
24	City Hall, Room 234	Washington, DC 20044	
25	1 Dr. Carlton B. Goodlett Place San Francisco, California 94102-4602	Telephone: (202) 616-0773 Facsimile: (202) 616-8470	
26	Telephone: (415) 554-4748 Facsimile: (415) 554-4715 F. Mail: hrittany faitalbarg@sfgay.org	E-mail: dan.mauler@usdoj.gov	
27	E-Mail: brittany.feitelberg@sfgov.org	COUNSEL FOR DEFENDANTS	
28	COUNSEL FOR PLAINTIFF		
	Stipulation and [Proposed] Order		

Stipulation and [Proposed] Order No. 3:17-cv-00485/00574-WHO

1 2 3 4	CITY AND COUNTY OF SAN FRANCISCO * * *	DONALD J. TRUMP, President of the United States; UNITED STATES OF AMERICA; KEVIN K. McALEENAN, Acting Secretary of Homeland Security; WILLIAM P. BARR, Attorney General of the United States in <i>City & County of San Francisco v. Trump, et al.</i> , No. 3:17-cv-	
5	OFFICE OF THE COUNTY COUNSEL,	00485-WHO	
6	COUNTY OF SANTA CLARA	DONALD J. TRUMP, President of the	
7 8	JAMES R. WILLIAMS County Counsel	United States; KEVIN K. McALEENAN, Acting Secretary of Homeland Security; WILLIAM P. BARR, Attorney General of	
9	/s/ Javier Serrano JAVIER SERRANO (CA Bar #252266)	the United States; MICK MULVANEY, Director of the Office of Management and Budget in <i>County of Santa Clara v. Trump</i> ,	
10	Deputy County Counsel	et al., No. 3:17-cv-00574-WHO	
11	70 West Hedding Street East Wing, Ninth Floor		
12	San Jose, CA 95110-1770 Telephone: (408) 299-5900		
13	Facsimile: (408) 292-7240 E-mail: javier.serrano@cco.sccgov.org		
14	COUNSEL FOR PLAINTIFF		
15	COUNTY OF SANTA CLARA		
16			
17	ORI	DER	
18	The Case Management Conference currently set for August 6, 2019, is rescheduled for		
19	August 20, 2019, at 2:00 pm. The parties shall file either a Joint Case Management Statement no		
20	later than August 13, 2019, that outlines their proposed procedure(s) and the proposed timing		
21	thereof, or a Joint Stipulation and Final Judgment with a proposed order.		
22	IT IS SO ORDERED.		
23			
24	DATED:, 2019	Hon. William H. Orrick	
25		United States District Judge	
26			
27			
28	3	3	
	Stipulation and [Proposed] Order No. 3:17-cv-00485/00574-WHO		

1	ATTESTATION OF SIGNATURES	
2		
3	I, Daniel D. Mauler, hereby attest, pursuant to Local Civil Rule 5-1(i)(3) of the Northern	
4	District of California, that concurrence in the filing of this document has been obtained from each	
5	signatory hereto.	
6	/s/ Daniel D. Mauler	
7	DANIEL D. MAULER (Va. Bar #73190)	
8	COUNSEL FOR DEFENDANTS	
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	Stipulation and [Proposed] Order No. 3:17-cv-00485/00574-WHO	